

REQUEST FOR REDESIGNATION
AND MAINTENANCE PLAN FOR
SULFUR DIOXIDE ATTAINMENT
IN LAKE COUNTY

Lake County, Indiana

Developed By:
The Indiana Department of Environmental Management

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REQUEST FOR REDESIGNATION AND MAINTENANCE PLAN FOR SULFUR DIOXIDE ATTAINMENT IN LAKE COUNTY

1.0 INTRODUCTION

This document is intended to support Indiana's request that Lake County be redesignated from nonattainment to attainment of the sulfur dioxide National Ambient Air Quality Standard (SO₂ NAAQS). The Lake County area has recorded three years of complete, quality assured ambient air quality monitoring data for 2002 – 2004 demonstrating attainment with the SO₂ standards.

Section 107(d)(3)(E) of the Clean Air Act (CAA), as amended in 1990, establishes specific requirements to be met in order for an area to be considered for redesignation, including:

- (a) A determination that the area has attained the SO₂ standards;
- (b) An approved State Implementation Plan (SIP) for the area under Section 110(k);
- (c) A determination that the improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the SIP and other federal requirements.
- (d) A fully approved maintenance plan under Section 175A;
- (e) A determination that all Section 110 and Part D requirements have been met.

This document addresses each of these requirements. It also provides additional information to support continued compliance with the SO₂ standards.

1.1 Background

Based on monitored violations, a portion of Lake County in Indiana was designated as primary nonattainment with the SO₂ NAAQS on March 3, 1978. In compliance with the Clean Air Act (CAA), the Indiana Department of Environmental Management (IDEM) developed and implemented rules designed to control emissions of SO₂ in Lake County.

The national primary ambient air quality standards for sulfur oxides measured as sulfur dioxide by the reference methods described in Appendix A of 40 CFR Part 50 are:

- (1) 80 micrograms per cubic meter (ug/m³) (0.03 ppm) annual arithmetic mean.
- (2) 365 ug/m³ (0.14 ppm) maximum 24 hour concentration not to be exceeded more than once per year per site.

The secondary ambient standard for sulfur dioxide is 1300 ug/m³ (0.5 ppm) maximum 3 hour concentration not to be exceeded more than once per year per site.

On January 19, 1989, the U.S. EPA approved Indiana's SO₂ rules for Lake County as meeting all the requirements of Section 110 and Part D of the CAA, 54 FR 2112. In the early 1990's,

Indiana conducted several rulemakings that have amended the Lake County SO₂ rules in 326 IAC 7. On February 8, 1994, U.S. EPA proposed disapproval of certain changes affecting Lake County in those rulemakings that were determined to be relaxations of the SIP (59 FR 5742). On August 29, 2000, other source-specific changes submitted by Indiana were approved into the SIP.

In order to bring Lake County into attainment for the SO₂ NAAQS, Indiana conducted extensive modeling and initiated a rulemaking to amend SO₂ requirements for many sources in the nonattainment area. The completed rulemaking, which will be effective on June 24, 2005, reflects a reduction of over 30,000 tons of SO₂ per year of allowable emissions from the emission limits in the 1989 State Implementation Plan.

1.2 Geographical Boundaries

Following is a brief description of the area of the the county for which redesignation is requested.

Lake County is in northwest Indiana. It is surrounded by the Indiana counties of Porter, Jasper and Newton. The SO₂ nonattainment area of Lake County is bounded by Lake Michigan to the north. To the west it is bounded by the Indiana-Illinois State line. On the south it is bounded by U.S. 30 from the State line to the intersection of I-65 then following I-65 to the intersection of I-94 then following I-94 to the Lake-Porter County line. On the east it is bounded by the Lake-Porter County line. (See Figure 3.1.)

1.3 Status of Air Quality

Air quality in Lake County has improved significantly in the past two decades and SO₂ levels measured in the nonattainment area have been well below the air quality standard for more than ten years. This fact, accompanied by decreases in emission levels discussed in Section 4.0, justifies a redesignation to attainment for the subject area based on Section 107(d)(3)(D) of the CAA.

2.0 REQUIREMENTS FOR REDESIGNATION

2.1 General

Section 110 and Part D of the CAA list the requirements that must be met before nonattainment areas can be considered for redesignation to attainment. In addition, U.S. EPA has published detailed guidance in a document entitled, "Procedures for Processing Requests to Redesignate Areas to Attainment," issued September 4, 1992, to Regional Air Directors. This document is hereafter referred to as the "Redesignation Guidance". This Request for Redesignation and Maintenance Plan is based on the Redesignation Guidance, supplemented with additional guidance received from staff of the Criteria Pollutant Section of U.S. EPA Region V.

The subsections below refer in greater detail to the requirements listed in Section 1.0 of this document. Each subsection describes how the applicable requirement has been met.

2.2 Sulfur Dioxide Monitoring

- (1) A demonstration that the NAAQS for SO₂, as published in 40 CFR 50.4, have been attained. Monitoring data must show the annual standard is not exceeded in a calendar year and the 24-hour standard not exceeded more than once per calendar year.
- (2) Ambient monitoring data that has been quality assured in accordance with 40 CFR 58.10, recorded in the Air Quality System (AQS) database, and available for public view.
- (3) A commitment that, once redesignated, the State will continue to operate an appropriate monitoring network to verify the maintenance of the attainment status.

2.3 Emission Inventory

- (1) A comprehensive emission inventory of major sources of sulfur dioxide completed for the base year (2003).
- (2) A projection of the emission inventory to a year at least 10 years following redesignation (2015).
- (3) A demonstration that the projected level of emissions is sufficient to maintain the standard.
- (4) A demonstration that improvement in air quality between the year that violations occurred (pre-1979) and the year attainment was achieved (2004) is based on permanent and enforceable emission reductions and not on temporary adverse economic conditions or unusually favorable meteorology.
- (5) Provisions for future annual updates of the inventory to enable tracking of the emission levels including an annual emission statement from major sources.

2.4 Modeling Demonstration

Supplemental dispersion modeling is required to comprehensively evaluate source impacts and to determine the areas of expected high concentration based upon current conditions.

The plan must identify and describe the dispersion model or other air quality model used to project ambient concentrations. Modeling conducted to demonstrate attainment in the original federally approved Part D SIP may generally be grandfathered from new modeling requirements.

Original modeling may be scaled to reflect any changes in emissions. However, new modeling may be required. The State will need to consider whether and to what extent the siting of new sources or modifications will affect points of maximum concentration such that air quality may

no longer be accurately represented by existing modeling. The State must also consider changes in U.S. EPA's Air Quality Modeling Guideline and the amount of time since the demonstration of attainment was completed.

Each plan must contain a summary of the air quality concentrations expected to result.

2.5 Controls and Regulations

- (1) An U.S. EPA approved SIP control strategy that includes Reasonably Available Control Technology (RACT) requirements for existing stationary sources covered by Control Technology Guidelines (CTG) and non-CTG RACT.
- (2) Evidence that control measures required in past SIP revisions have been fully implemented.
- (3) Acceptable provisions to provide for New Source Review.
- (4) Assurances that existing controls will remain in effect after redesignation, unless the State demonstrates through modeling that the standard can be maintained without one or more controls.
- (5) If appropriate, a commitment to adopt a requirement that all transportation plans conform with, and are consistent with, the SIP.

2.6 Corrective Actions for Potential Future Violations of the Standards

- (1) A commitment to submit a revised plan eight years after redesignation.
- (2) A commitment to enact and implement expeditiously additional contingency control measures in response to exceeding specified predetermined levels (triggers) or in the event that future violations of the ambient standards occur.
- (3) A list of potential contingency measures that would be implemented in such an event.
- (4) A list of sulfur dioxide sources potentially subject to future controls.

3.0 SULFUR DIOXIDE MONITORING

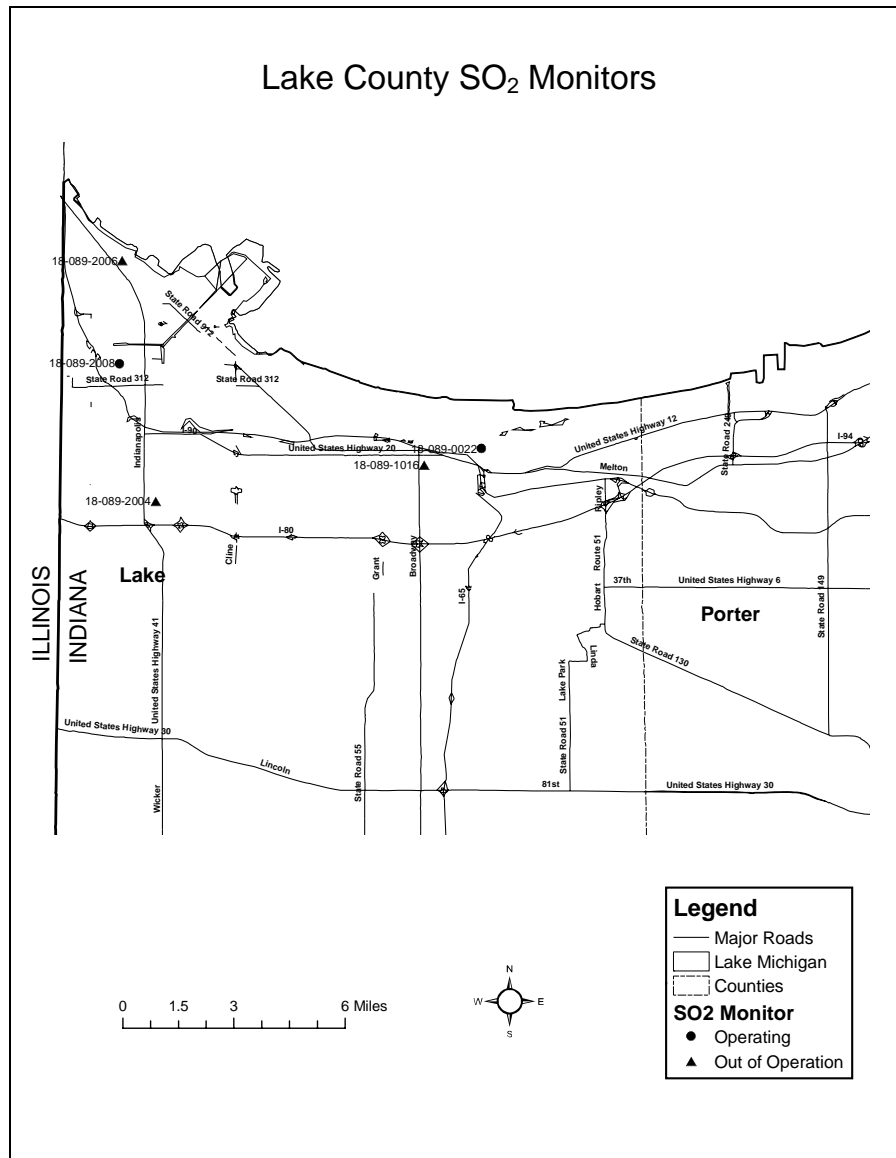
3.1 Monitoring Network

There are currently two monitors measuring sulfur dioxide concentrations in Lake County. These monitors are operated by the IDEM Office of Air Quality. A listing of the sites in use since 1996 with the highest reading at each from 1996 through 2004 is shown in Table 3.1. The monitor locations are shown in Figure 3.1.

Table 3.1
Summary of Monitoring Results Since 1996

SITE ID	CITY	ADDRESS	YEAR	1ST MAX 24-HR	1ST MAX 3-HR	ANNUAL MEAN	NO. OF EXCEED
18-089-0022	Gary	201 MISSISSIP	1997	0.047	0.133	0.0053	0
18-089-0022	Gary	201 MISSISSIP	1998	0.025	0.079	0.0054	0
18-089-0022	Gary	201 MISSISSIP	1999	0.039	0.094	0.0058	0
18-089-0022	Gary	201 MISSISSIP	2000	0.049	0.068	0.0058	0
18-089-0022	Gary	201 MISSISSIP	2001	0.033	0.083	0.0049	0
18-089-0022	Gary	201 MISSISSIP	2002	0.037	0.094	0.006	0
18-089-0022	Gary	201 MISSISSIP	2003	0.034	0.079	0.0044	0
18-089-0022	Gary	201 MISSISSIP	2004	0.051	0.084	0.0049	0
18-089-1016	Gary	Federal Bldg	1996	0.041	0.112	0.0028	0
18-089-1016	Gary	Federal Bldg	1997	0.03	0.163	0.0025	0
18-089-2008	Hammond	1300 141 ST S	1996	0.036	0.11	0.0073	0
18-089-2008	Hammond	1300 141 ST S	1997	0.032	0.085	0.0076	0
18-089-2008	Hammond	1300 141 ST S	1998	0.075	0.171	0.0087	0
18-089-2008	Hammond	1300 141 ST S	1999	0.04	0.081	0.0068	0
18-089-2008	Hammond	1300 141 ST S	2000	0.029	0.106	0.0059	0
18-089-2008	Hammond	1300 141 ST S	2001	0.031	0.082	0.0059	0
18-089-2008	Hammond	1300 141 ST S	2002	0.015	0.054	0.004	0
18-089-2008	Hammond	1300 141 ST S	2003	0.019	0.085	0.0035	0
18-089-2008	Hammond	1300 141 ST S	2004	0.022	0.037	0.004	0

Figure 3.1
Lake County Nonattainment Area and SO2 Monitors



3.2 Ambient Data

A Quick Look report from the AQS database is provided in Appendix A.

As shown in Table 3.1 and Appendix A, there have been no exceedances of the annual (0.03 ppm), 24 hour (0.14 ppm), or 3 hour (0.5 ppm) standards in Lake County since before 1980.

Therefore, the monitoring data demonstrates that the NAAQS for sulfur dioxide have been attained in Lake County.

3.3 Quality Assurance

All the data shown in Appendix A have been quality assured in accordance with 40 CFR 58.10, as well as the Indiana Quality Assurance Manual and found to be valid. The data have been recorded in the AQS database and through it, made available to the public.

3.4 Continued Monitoring

Indiana commits to continue monitoring sulfur dioxide levels at the current National Air Monitoring Sites (NAMS) and State and Local Air Monitoring Sites (SLAMS) indicated in Section 3.1. IDEM will consult with U.S. EPA Region V staff prior to making any changes to the existing monitoring network should changes be necessary in the future. IDEM will continue to quality assure the monitoring data to meet the requirements of 40 CFR 58. Connection to a central station and updates to the IDEM website (www.in.gov/idem) will provide real time availability of the data and knowledge of any exceedances. IDEM will enter all data into AQS on a timely basis in accordance with federal guidelines.

4.0 EMISSION INVENTORY

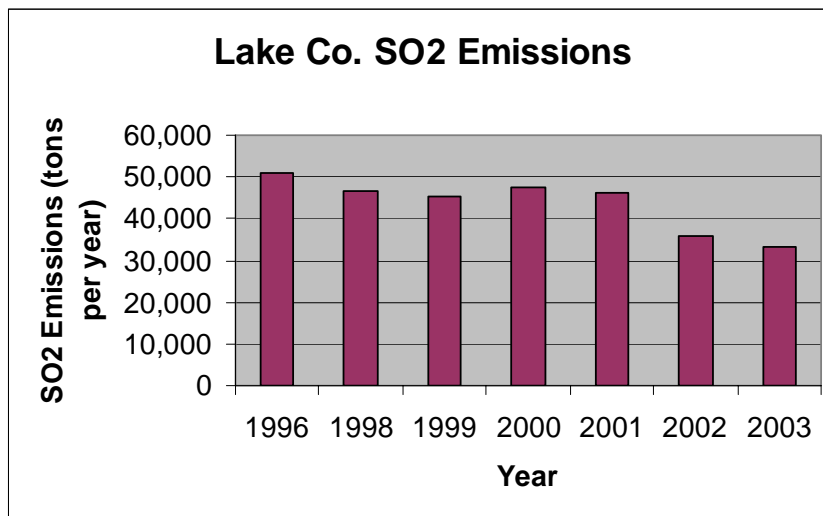
4.1 Base Year Inventory

A summary of the SO₂ emission data for Lake County is shown in Table 4.1 and Graph 4.1.

Table 4.1
Lake County SO₂ Emissions (tons per year)

1996	1998	1999	2000	2001	2002	2003
50,736	46,629	45,171	47,693	46,329	35,940	33,086

Graph 4.1



A more detailed list of Lake County SO₂ emissions is in Appendix B.

4.2 Emission Projections

Table 4.2
SO₂ Emissions for Lake County Projected to 2015 (tons per year)

2002	2015
35,957	43,568

Details of SO₂ emissions for Lake County are in Appendix C.

4.3 Demonstration of Maintenance

Ambient air quality data from all monitoring sites indicate that the SO₂ NAAQS are being met through 2004. Total emissions of SO₂ from all sources are projected to increase between 2004 and 2015 due to economic growth in the area. Although emissions in 2015 are projected to be higher than 2002 and 2003, emissions in 2001 and prior years were higher than the projections for 2015. During this time, monitoring data was never higher than 29% of the annual standard, and in only one instance, 54% at the Hammond site in 1998, did the maximum 24-hour value exceed 36% of that standard. The 3-hour maximum values have been one-third of that secondary standard or less. Therefore, attainment is expected to be maintained through the maintenance horizon year of 2015.

In addition, the modeling results demonstrating attainment assume a potential to emit of 120,800 tons per year of SO₂. Therefore, the projected growth in actual emissions to 43,568 tons SO₂ in 2015 will not cause a violation of the SO₂ NAAQS.

4.4 Permanent and Enforceable Emissions Reductions

One of the requirements for approval of the redesignation SIP is a demonstration that improvement in air quality between the year that violations occurred (pre-1979) and the year that attainment was achieved (2003) was the result of permanent and enforceable emission reductions and not because of temporary adverse economic conditions or unusually favorable meteorology.

Permanent and enforceable reductions of SO₂ emissions in Lake County contributed to the attainment of the SO₂ standards. Some of the reductions are attributable to the closure of stationary sources or emissions units. In addition, substantial reductions were made at U.S. Steel-Gary Works in accordance with a 1996 Agreed Order with IDEM, and Cargill, Ispat Inland, and Carmeuse Lime have reduced emission limits for certain units to help achieve reductions of SO₂ emissions.

4.5 Provisions for Future Updates

As required by Section 175A(b) of the CAA, Indiana commits to submit to the Administrator, eight years after redesignation, an additional revision of this SIP. The new revision will contain Indiana's plan for maintaining the national primary sulfur dioxide air quality standard for 10 years beyond the first 10-year period after redesignation (2015-2025).

5.0 MODELING

5.1 Modeling Analysis

The attainment demonstration modeling reflects the current regulatory air quality model, emissions inventory, and building dimensions. Six years of meteorological data were used for this attainment demonstration. The year 1987 and the five years of 1991 to 1995 were selected to model. The year 1987 was included because this was the worst case year modeled from the original Lake County SO₂ SIP. The results of the air quality modeling show attainment of the 3-hour, 24-hour and annual SO₂ NAAQS. IDEM believes this attainment demonstration accurately represents the current SO₂ air quality in Lake County necessary to support redesignation of the affected portion of Lake County to attainment.

The results of the air quality modeling are as follows.

Table 5.1.1

**Modeling Results for Lake County SO₂ Attainment Demonstration
3-Hour and 24-Hour Results with Desulfurized* Limits**

Year	3-Hour Modeled (ug/m³)	Concentration Background (ug/m³)	Total (ug/m³)	24-Hour Modeled (ug/m³)	Concentration Background (ug/m³)	Total (ug/m³)
NAAQS			1300			365
1987	816.9	7.9	824.8	303.8	11.0	314.8
1991	1077.3	9.6	1086.9	331.3	12.7	344.0
1992	1125.3	7.9	1133.2	338.8	10.7	349.5
1993	1140.0	7.0	1147.0	341.9	11.7	353.6
1994	1124.6	7.9	1132.5	338.0	10.2	348.2
1995	844.9	7.9	852.8	303.5	11.8	315.3

*Desulfurized limits means when the coke oven gas desulfurization emissions unit at U.S. Steel-Gary Works is operating.

Table 5.1.2

**Modeling Results for Lake County SO₂ Attainment Demonstration
3-Hour and 24-Hour Results with Undesulfurized* Limits**

Year	3-Hour Modeled (ug/m³)	Concentration Background (ug/m³)	Total (ug/m³)	24-Hour Modeled (ug/m³)	Concentration Background (ug/m³)	Total (ug/m³)
NAAQS			1300			365
1987	843.0	10.5	853.5	317.9	11.0	328.9
1991	900.7	7.9	908.6	352.1	11.1	363.2
1992	933.4	14.0	947.4	343.2	10.6	353.8
1993	961.1	7.9	969.0	351.5	12.7	364.2
1994	1005.1	7.9	1013.0	356.4	8.0	364.4
1995	1052.1	11.4	1063.5	346.7	11.8	358.5

*Undesulfurized limits means when the coke oven gas desulfurization emissions unit at U.S. Steel-Gary Works is not operating. Results listed in Table 5.1.2 are for U.S. Steel-Gary Works Undesulfurized Scenario 1.

Table 5.1.3

Modeling Results for Lake County SO₂ Attainment Demonstration
Annual Results

Year	Annual Modeled (ug/m³)	Concentration Background (ug/m³)	Total (ug/m³)
NAAQS			80
1987	64.3	11.4	75.7
1991	67.4	11.3	78.7
1992	67.1	11.1	78.2
1993	63.0	11.3	74.3
1994	65.0	11.2	76.2
1995	65.5	11.3	76.8

A detailed modeling analysis was submitted to U.S. EPA Region V with the request for parallel processing of the Lake Co. SO₂ rules on April 8, 2005. Further information on the modeling analysis is in Appendix D.

Based on the above, Indiana hereby requests that the submitted modeling be used to satisfy the modeling requirement of the CAA.

6.0 CONTROLS AND REGULATIONS

This section provides specific information on the control measures implemented in Lake County, including CAA requirements and additional state or local measures implemented beyond CAA requirements.

6.1 Lake County SO₂ Rule

Indiana has promulgated revised rules for Lake County SO₂ emissions that reflect the reduction of SO₂ in the area. The limits relating to Lake County are found in 326 IAC 7-4.1.

These rules were submitted to U.S. EPA on April 8, 2005, as a parallel processing request for approval into the Indiana State Implementation Plan. The state rules will become effective on June 24, 2005.

6.2 Implementation of Past SIP Revisions

Sulfur dioxide emissions in Lake County have been regulated by 326 IAC 7-4-1.1, which contained limits for specific sources. The Lake County section of the Indiana SO₂ rule was in effect from 1991 to 2005 and was revised several times. That rule has been replaced by the new

rule, 326 IAC 7-4.1, that will be effective on June 24, 2005, and contains revised emission limits for specific sources of SO₂ in Lake County. The completed rulemaking reflects a reduction of over 30,000 tons of SO₂ per year of allowable emissions from the emission limits in the 1989 State Implementation Plan.

In Lake County, compliance is monitored by inspectors from the Hammond Air Pollution Control Department, the Gary Division of Air Pollution Control, and IDEM's Northwest Regional Office.

6.3 New Source Review Provisions

Indiana has a longstanding and fully implemented New Source Review (NSR) program. This program is addressed in rule 326 IAC 2. The rule includes provisions for the Prevention of Significant Deterioration (PSD) in 326 IAC 2-2. Indiana's PSD program has been approved by U.S. EPA as part of its SIP. (Final program approval - May 20, 2004, 69 FR 29071)

Any facility that is not listed in the 2003 emissions inventory, or for the closing of which credit was taken in demonstrating attainment, will not be allowed to construct, reopen, modify or reconstruct without meeting applicable permit rule requirements. The review process will be identical to that used for new sources. Once the area is redesignated, IDEM will implement NSR through the PSD program which requires an air quality analysis to ensure that the new source will not threaten to exceed the NAAQS.

6.4 Controls to Remain in Effect

Indiana commits to maintain the control measures listed above after redesignation. Further, Indiana commits that any changes to its rules, or emission limits applicable to SO₂ sources, as required for maintenance of the SO₂ standards in Lake County, will be submitted to U.S. EPA for approval as a SIP revision. This will include, where appropriate, a demonstration based on modeling that the standard will be maintained.

Indiana does intend, upon redesignation, to apply 326 IAC 2-2 (Prevention of Significant Deterioration Requirements) rather than 326 IAC 2-3 (Emission Offset) for permitting any new sources or modifications. Indiana, through IDEM's Office of Compliance and Enforcement, has the legal authority and necessary resources to actively enforce any violations of its rules or permit provisions. After redesignation, Indiana intends to continue enforcing all rules that relate to the emission of sulfur dioxide in Lake County.

7.0 CORRECTIVE ACTIONS

7.1 Commitment to Revise Plan

As noted in Section 4.5 above, Indiana hereby commits to review its Maintenance Plan eight (8) years after redesignation, as required by Section 175A of the CAA.

7.2 Commitment for Contingency Measures

Indiana hereby commits to adopt and implement expeditiously necessary corrective actions in the following circumstances:

Warning Level Response:

A Warning Level Response will be prompted whenever a monitored annual value or second-high 24-hour value exceed 90 percent of their standards within the maintenance area. A Warning Level Response will consist of a study to determine whether there is a trend toward higher SO₂ values or whether emissions appear to be increasing. The study will evaluate whether the trend, if any, is likely to continue and, if so, the control measures necessary to reverse the trend taking into consideration ease and timing for implementation, as well as economic and social considerations. Completion of the study in response to a Warning Level Response trigger will take place as expeditiously as possible, but in no event later than twelve (12) months from the time that IDEM is aware that the violation occurred.

Should it be determined through the Warning Level study that action is necessary to reverse the noted trend, the procedures for control selection and implementation outlined under “Action Level Response” shall be followed.

Action Level Response

An Action Level Response will be prompted whenever a violation of the sulfur dioxide standard occurs within the maintenance area. In the event that the Action Level is triggered and is not due to an exceptional event, malfunction, or noncompliance with a permit condition or rule requirement, IDEM will determine additional control measures needed to assure future attainment of NAAQS for SO₂. In this case, measures that can be implemented in a short time will be selected in order to be in place within eighteen (18) months from the time that IDEM is aware that the violation occurred.

Control Measure Selection and Implementation

Adoption of any additional control measures is subject to the necessary administrative and legal process. This process will include publication of notices, an opportunity for public hearing, and other measures required by Indiana law for rulemaking by state environmental boards.

If a new measure/control is already promulgated and scheduled to be implemented at the federal or state level, and that measure/control is determined to be sufficient to address the upward trend in air quality, additional local measures may be unnecessary. Furthermore, Indiana will submit to U.S. EPA an analysis to demonstrate the proposed measures are adequate to return the area to attainment.

7.3 Contingency Measures

Contingency measures to be considered will be selected which are deemed appropriate and effective at the time the selection is made. Because sulfur dioxide emissions are attributed primarily to point sources, the options available are limited to appropriate measures for the types of culpable sources. The steps IDEM will take to determine culpability will include:

- determination of whether the exceedance should be classified as an exceptional event pursuant to "Guideline on the Identification and Use of Air Quality Data Affected by Exceptional Events."
- Evaluation of meteorological data and conduct modeling studies to determine which point source(s), if any, is the cause of the problem.
- review of operating records of source identified in the above steps to identify equipment malfunctions or permit or rule violations.

Although the point sources listed in the inventory will be the primary focus, the study will not be limited to these sources but will encompass any other potential sources of SO₂.

The selection of measures will be based upon cost-effectiveness, emission reduction potential, economic and social considerations or other factors that IDEM deems appropriate. IDEM will solicit input from all interested and affected persons in the maintenance area prior to selecting appropriate contingency measures.

A selected contingency measure can be initiated immediately in response to an action level response and should be in place within eighteen (18) months. No contingency measure shall be implemented without providing the opportunity for full public participation during which the relative costs and benefits of individual measures, at the time they are under consideration, can be fully evaluated.

7.4 List of Sources

The sulfur dioxide sources potentially subject to future controls is the current list of major sources which is found in Appendix B. As noted in Sections 7.2 and 7.3 above, sources subject to additional controls will be those which the study shows are responsible for triggering the contingency measures and the control of which will most effectively help to ensure compliance with the standards. In addition to reviewing the known sources, the possibility that the problem is attributable to new or previously unknown sources will be considered.

8.0 PUBLIC PARTICIPATION

In accordance with Section 100(a)(2) of the CAA, public participation in the SIP is provided for as follows:

Notice of availability of the SO₂ redesignation documents and the time and date of the public hearing has been published in the Indianapolis Star, the Gary Post-Tribune, and the Munster Times.

The Public hearing will be held as follows:

Tuesday, July 26, 2005 at 6:00 p.m. in the Multi-Purpose Room of the Business, Science & Administration Building at Ivy Tech State College, 1440 East 35th Avenue, Gary, Indiana 46409.

Indiana published notification for a public hearing and solicitation for public comment concerning the draft Redesignation Petition and Maintenance Plan in several publications, including the primary Evansville newspaper on or before March 18, 2005. A public hearing was conducted on April 19, 2005 and a number of comments were received. The public comment period closed on April 22, 2005. Appendix E includes a copy of the public notice, certifications of publication, the transcript from the public hearing, copies of all written comments received, and a summary of all comments received that includes IDEM's responses, as applicable.

Copies of the proof of publication and the transcript of the hearing can be found in Appendix E.

9.0 CONCLUSION

Lake County, Indiana has attained the federal ambient sulfur dioxide standards and complied with the applicable provisions of the 1990 Amendments to the Clean Air Act regarding redesignations of primary sulfur dioxide nonattainment areas. Documentation to that effect is contained herein. A State Implementation and Maintenance Plan has been prepared that meets the requirement of Section 110(a)(1) of the 1990 Clean Air Act. Appendix C addresses all requirements of the Plan including some that may not be covered above.

The State of Indiana hereby requests that Lake County be redesignated to sulfur dioxide attainment simultaneously with the U.S. EPA approval of the Indiana State Implementation Plan provisions contained herein.